

FILED 02 MAY '23 13:30 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:23-cr-00141-51

v.

INDICTMENT

ALAN MICHAEL PLACZKIEWICZ,

18 U.S.C. §§ 1349, 1341, 1028(a)(7)

Defendant.

THE GRAND JURY CHARGES:

1. Comenity Bank and Truist Bank, are “financial institutions” as defined in 18 U.S.C. § 20.

**COUNT 1
(Conspiracy to Commit Mail and Bank Fraud)
(18 U.S.C. § 1349)**

2. Beginning on or about June 1, 2019, and continuing until on or about August 3, 2022, within the District of Oregon and elsewhere, defendant **ALAN MICHAEL PLACZKIEWICZ** and others, known and unknown to the grand jury, did knowingly combine, conspire, confederate, and agree with each other to commit the following offenses against the United States:

a. Mail Fraud, to wit, they agreed to knowingly devise and intend to devise a material scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises in violation of 18 U.S.C. § 1341.

b. Bank Fraud, to wit, they agreed to knowingly execute and attempt to execute a material scheme and artifice to defraud a financial institution and to obtain money, funds, credits, assets, securities, or other property owned by, or under the custody or control of, financial institutions by means of materially false or fraudulent pretenses, representations, and promises in violation of 18 U.S.C. § 1344.

MANNER AND MEANS AND SCHEME TO DEFRAUD

3. Defendants and others known and unknown to the grand jury used the following manner and means to carry out the conspiracy and scheme to defraud:

4. It was part of the conspiracy and scheme to defraud that the defendant and unnamed co-conspirators obtained personal identifying information of individuals ("PII").

5. It was part of the conspiracy and scheme to defraud that the defendant and unnamed co-conspirators used stolen PII to open bank accounts, credit card accounts, Cash App Accounts, and similar financial accounts with the intent to steal funds from those financial accounts.

6. It was part of the conspiracy and scheme to defraud that the defendant and unnamed co-conspirators, using the United States Postal Service and private or commercial interstate carriers, would have the cards associated with the fraudulently opened accounts

shipped to the defendant's address, and the defendant would then reship credit cards to another location.

7. It was part of the conspiracy and scheme to defraud that that the defendant would receive payments through various accounts, including but not limited to Paypal accounts, for shipping items as instructed.

All in violation of 18 U.S.C. § 1349.

COUNTS 2-4
(Mail Fraud)
(18 U.S.C. §§ 1341, 2)

1. All prior paragraphs of this Indictment are incorporated herein.

2. On or about the dates set forth below in each Count, in the District of Oregon and elsewhere, the defendant as identified below, for purposes of executing and attempting to execute the material scheme and artifice to defraud as described in Count 1 of this indictment and to obtain money and property by materially false and fraudulent pretenses, representations and promises, knowingly placed in an authorized depository for mail, to be sent and delivered by the Postal Service:

Count	Defendant(s)	Date	Package	Listed contents	Victim(s)
2.	ALAN MICHAEL PLACZKIEWICZ	01/01/2021 to 01/12/2021	#CM 218 806 883 US	"office supplies used"	Adult Victim 1, Comenity Bank
3.	ALAN MICHAEL PLACZKIEWICZ	01/01/2021 to 01/31/2021	#CM 218 674 520 US	"office supplies used"	Adult Victim 2, Truist Bank
4.	ALAN MICHAEL PLACZKIEWICZ	07/01/2021 to 07/28/2021	#CE 980 461 017 US	"gift card, documents"	Adult Victim 3, Paypal

All in violation of 18 U.S.C. §§ 1341 and 2.

COUNTS 5-7

**(Unlawful Transfer, Possession, or Use of a Means of Identification)
(18 U.S.C. §§ 1028(a)(7), 2)**

1. All prior paragraphs of this Indictment are incorporated herein.
2. On or about the dates set forth below in each Count, in the District of Oregon and elsewhere, within the District of Oregon and elsewhere, defendant identified below, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit: documents and access devices containing personal identifying information of others including name, knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit: 18 U.S.C. §§ 1349, 1341, and 2, the said means of identification was transported in the mail in the course of such transfer and use:

Count	Defendant(s)	Date	Package	Means of Identification
5.	ALAN MICHAEL PLACZKIEWICZ	01/01/2021 to 01/12/2021	#CM 218 806 883 US	Bank account card in the name of Adult Victim 1
6.	ALAN MICHAEL PLACZKIEWICZ	01/01/2021 to 01/31/2021	#CM 218 674 520 US	Cash App card in the name of Adult Victim 2
7.	ALAN MICHAEL PLACZKIEWICZ	07/01/2021 to 07/28/2021	#CE 980 461 017 US	Business debit card in the name of Adult Victim 3

All in violation of 18 U.S.C. §§ 1028(a)(7), 1349, 1341 and 2.

Dated: May 2, 2023

A TRUE BILL. *///*



OFFICATING FOREPERSON

Presented by:

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